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13 *Toshiba America Information Systems, Inc.*

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 (SAN FRANCISCO DIVISION)

17 IN RE: CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

19 This Document Relates to:

20 Case No. 12-cv-02648

21 P.C. RICHARD & SON LONG ISLAND
22 CORPORATION; MARTA COOPERATIVE
23 OF AMERICA, INC.; AND ABC
24 APPLIANCE, INC.,

Plaintiffs,

v.

26 HITACHI, LTD., et al.,

27 Defendants.

**DECLARATION OF DANA E.
FOSTER IN SUPPORT OF
TOSHIBA AMERICA
INFORMATION SYSTEMS,
INC.'S MOTION TO COMPEL
P.C. RICHARD, MARTA, AND
ABC APPLIANCE TO PRODUCE
DISCOVERY**

28
DECLARATION OF DANA E. FOSTER IN SUPPORT
OF TOSHIBA AMERICA INFORMATION SYSTEMS, INC.'S MOTION
TO COMPEL P.C. RICHARD, MARTA, AND ABC APPLIANCE TO PRODUCE DISCOVERY

Case No. 07-5944 SC
MDL No. 1917

1 I, Dana E. Foster, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for
3 Defendant Toshiba America Information Systems, Inc.

4 2. I submit this declaration in support of Toshiba America Information Systems,
5 Inc.'s Motion to Compel P.C. Richard, MARTA, and ABC Appliance to Produce Discovery.

6 3. Attached hereto as Exhibit 1 is a true and correct copy of TAIS's and
7 PENAC's First Set of Requests for Production of Documents.

8 4. Attached hereto as Exhibit 2 is a true and correct copy of the Plaintiffs'
9 responses to TAIS's First Set of Requests for Production of Documents and PENAC's
10 Second Set of Requests for Production of Documents.

11 5. Attached hereto as Exhibit 3 is a true and correct copy of the letter from Dana
12 E. Foster to Robert C. Tietjen, Esq., dated February 28, 2014.

13 6. Attached hereto as Exhibit 4 is a true and correct copy of the letter from Dana
14 E. Foster to Anne Nardacci, Esq., dated April 22, 2014.

15 7. Attached hereto as Exhibit 5 is a true and correct copy of Special Master's
16 Order re Hannstar Display Corporation's Motion to Compel Best Buy to Respond Further to
17 Document Request No. 45, *In re: TFT-LCD (Flat Panel) Antitrust Litig.*, No. M 07-1827 SI
18 (N.D. Cal. Feb. 15, 2012), ECF No. 4825.

19 8. Attached hereto as Exhibit 6 is a true and correct copy of Order Overruling
20 Best Buy's Objection to Special Master's Order Granting Hannstar Display Corp.'s Motion to
21 Compel, *In re: TFT-LCD (Flat Panel) Antitrust Litig.*, No. M 07-1827 SI (N.D. Cal. Apr. 4,
22 2012), ECF No. 5403.

23 9. Attached hereto as Exhibit 7 is a true and correct copy of Special Master's
24 Order re Motions of LG Display and Sharp to Compel Various Plaintiffs to Produce
25 Settlement Agreements, *In re: TFT-LCD (Flat Panel) Antitrust Litig.*, No. M 07-1827 SI
26 (N.D. Cal. Sept. 28, 2012), ECF No. 6862.

27 10. Attached hereto as Exhibit 8 is a true and correct copy of the letter from Anne
28 M. Nardacci to Dana Foster, dated May 12, 2014.

Dana E. Foster

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